

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION**

Roslynn Briggs  
6003 76<sup>th</sup> Ave. NE  
Marysville, WA 98270

Plaintiff,

v.

VRM Group a/k/a Vision Receivable  
Management Group, Inc.  
835 East and West Rd.  
West Seneca, NY 14206

Defendant.

Case No.:

Judge:

**COMPLAINT FOR DAMAGES  
UNDER THE FAIR DEBT  
COLLECTION PRACTICES ACT,  
INVASION OF PRIVACY, AND OTHER  
EQUITABLE RELIEF**

**JURY DEMAND ENDORSED HEREIN**

**JURISDICTION AND VENUE**

1. Jurisdiction is founded on 28 U.S.C. §1331 pursuant to the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. §1692. Venue is proper because a substantial part of the events giving rise to this claim occurred in this judicial district.

**FACTS COMMON TO ALL COUNTS**

2. Plaintiff is a “consumer” as defined by 15 U.S.C. §1692a(3).
3. Plaintiff incurred a “debt” as defined by 15 U.S.C. §1692a(5).
4. At the time of the communications referenced herein, Defendant either owned the debt or was retained by the owner to collect the debt.
5. Defendant is a “debt collector” as defined by the FDCPA, 15 U.S.C. §1692a(6).
6. Plaintiff filed this claim within the timeframe permitted under the FDCPA.
7. On or around January 19, 2010, Defendant telephoned Plaintiff and left a voice message.
8. During this communication, Defendant falsely represented itself as a detective.

9. During this communication, Defendant falsely represented that it was investigating fraudulent activity that concerned Plaintiff.
10. During this communication, Defendant falsely represented that it would send the matter to the Clark County Sheriff's department if Plaintiff did call Defendant.
11. On or around January 21, 2010, Defendant telephoned Plaintiff's father ("Father") and left a voice message.
12. During this communication, Defendant falsely represented itself as a detective.
13. During this communication, Defendant falsely represented that it was investigating fraudulent activity that concerned Plaintiff.
14. During this communication, Defendant falsely represented that it would send the matter to the Clark County Sheriff's department if Plaintiff did call Defendant.
15. Defendant damaged Plaintiff emotionally and mentally and caused Plaintiff substantial anxiety and stress.
16. Defendant violated the FDCPA.

### **COUNT ONE**

#### **Violation of the Fair Debt Collection Practices Act**

17. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
18. Defendant violated 15 U.S.C. §1692c in that it communicated with a third party and failed to comply with 15 U.S.C. §1692b.

### **COUNT TWO**

#### **Violation of the Fair Debt Collection Practices Act**

19. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.

20. Defendant violated 15 U.S.C. §1692c in that it communicated with a third party and disclosed that Plaintiff owed the debt.

**COUNT THREE**

**Violation of the Fair Debt Collection Practices Act**

21. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.

22. Defendant violated 15 U.S.C. §1692e in that it falsely represented the character, amount, and/or legal status of the debt.

**COUNT FOUR**

**Violation of the Fair Debt Collection Practices Act**

23. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.

24. Defendant violated 15 U.S.C. §1692e in that it threatened action that could not legally be taken and/or that was not intended to be taken.

**COUNT FIVE**

**Violation of the Fair Debt Collection Practices Act**

25. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.

26. Defendant violated 15 U.S.C. §1692e by making misrepresentations during its communications with Plaintiff.

**COUNT SIX**

**Violation of the Fair Debt Collection Practices Act**

27. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.

28. The Defendant violated 15 U.S.C. §1692f in that its actions were unfair and/or unconscionable means to collect the debt.

**COUNT SEVEN**

**Invasion of Privacy by Public Disclosure of a Private Fact**

29. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
30. Defendant released information which was private to Plaintiff and concerned Plaintiff's private life to Plaintiff's father.
31. Defendant's the threat of legal action to this person is highly offensive.
32. The information disclosed is not of legitimate concern to the public.

**JURY DEMAND**

33. Plaintiff demands a trial by jury.

**PRAYER FOR RELIEF**

34. Plaintiff prays for the following relief:
- a. Judgment against Defendant for actual damages, statutory damages, and costs and reasonable attorney's fees pursuant to 15 U.S.C. §1692k.
  - b. Judgment, in an amount to be determined at trial, against Defendant for the Invasion of Privacy by Public Disclosure of a Private Fact.
  - c. For such other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Legal Helpers, P.C.

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